

MANX MINDS



Privacy Policy

Date of issue:	July 2018
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1 Who are we?

We are MANX MINDS.

The activities of the MANX MINDS cover providing Mental Health First Aid and general well-being training. MANX MINDS works with all members of the community, regardless of their abilities.

We can be most easily contacted by email at <manxminds@gmail.com>. Written correspondence may be addressed to MANX MINDS, 1, Barrule Park, Ramsey, Isle of Man, IM8 2BW.

2 Abbreviations used in this policy together with relevant explanations

"we" and "our"	MANX MINDS.
"individual participant"	individuals who take part in courses and events run by MANX MINDS.
"enquirers"	individuals or companies who make enquiries about courses and events run by MANX MINDS.
"company"	company/organisation who engage the services of MANX MINDS.
GDPR	The General Data Protection Regulation in the Isle of Man, as regulated by the Isle of Man Information Commissioner.
DBS	The Disclosure and Barring Service, Department of Home Affairs, Isle of Man Government. This is an Executive Agency of the UK Home Office. The DBS helps employers and voluntary organisations to make safer recruitment decisions.

3 About this Policy.

This policy explains when and why we collect personal information about our subscribers, course participants, interest parties and other stakeholders, how we use it and how we keep it secure. The policy also details your rights if you feel that MANX MINDS has not met it's obligations as required by the Isle of Man Information Commissioner.

A summary of our policy is as follows:

- 3.1 We may collect, use and store your personal data, as described in this Data Privacy Policy and as described when we collect data from you.
- 3.2 We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website <manxminds ...> or contact the Club (see Section 1 above).
- 3.3 We will always comply with GDPR when dealing with your personal data. For the purposes of the GDPR, we will be the "controller" of all personal data we hold about you.

4 What information we collect and why.

Type of information	Purposes	Legal basis of processing
Website subscribers / course participants / enquirers name,	Managing the business MANX MINDS.	For the purposes of our legitimate interests in

<p>address, telephone numbers and e-mail addresses.</p>	<p>Advising and organising courses. Training and advising on issues solely related to MANX MINDS and it's activities.</p> <p>Satisfying any audit requests for an auditor to gain assurance on the completeness and accuracy of the MANX MINDS Annual Accounts.</p> <p>To answer your queries or complaints.</p>	<p>operating MANX MINDS.</p>
<p>Individual course participant's allergy information.</p>	<p>Allergy information is used for the individual course participant's safety and well being when food is provided at any course run by MANX MINDS.</p>	<p>Specific permission given by the individual course participant for the purposes of legitimate interests in operating the MANX MINDS.</p>

5 Retention of personal data.

Individual and Company information will be retained by MANX MINDS for marketing and course certification purposes. Records for each year obtained from members will be destroyed on the earlier of:

- written notice that the individual/company/enquirer no longer wishes to be contacted or information to be held by MANX MINDS.

MANX MINDS Annual Accounts and our business diary will be held indefinitely as part of MANX MINDS administrative responsibilities.

Supplier invoices will be retained until one year after the relevant period's MANX MINDS Accounts have been prepared **and agreed.**

6 Sharing of personal data.

It is the MANX MINDS policy not to share any personal data with any third party.

7 Accessing your data.

You have a right to ask for a copy of the information which we hold about you. This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, in these circumstances we may refuse to comply with the request.

8 Your rights.

Under certain circumstances, you have the right to:

8.1 Request correction of the personal information that we hold about you.

This enables you to have any incomplete or inaccurate information we hold about you corrected.

8.2 Request erasure of your personal information.

This enables you to ask us to delete or remove personal information where there is no longer a good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

8.3 Object to processing of your personal information.

You also have the right to object if MANX MINDS were processing your personal information for direct marketing purposes. However, it is stressed that it is not MANX MINDS policy to market personal information to third parties.

All such requests may be sent through the Club's email address at **< MANX MINDS >** Written correspondence may be addressed to MANX MINDS, 1, Barrule Park, Ramsey, Isle of Man, IM8 2BW.

Your complaint will be investigated by MANX MINDS under the terms of this policy and we will respond to you within one month. Please also refer to Section 0 below.

MANX MINDS, 1, Barrule Park, Ramsey, Isle of Man, IM8 2BW.

9 MANX MINDS responsibility to report data breaches.

If the MANX MINDS experiences a personal data breach (please see definition below for guidance) we will consider whether this poses a risk to people. We will consider the likelihood and severity of any risk to people’s rights and freedoms, following the breach. When we have made this assessment, if it is likely there will be a risk, then we will notify the Isle of Man Information Commissioner. However, if it is unlikely then we will not report the incident.

In any event MANX MINDS will review its policy and procedures to ensure it can meet the requirements of GDPR.

For the avoidance of doubt, a personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. It also means that a breach is more than just about losing personal data.

10 You have the right to make a complaint at any time to the Isle of Man Information Commissioner:

Address	First Floor, Prospect House, Prospect Hill, Douglas, Isle of Man. IM1 1ET
Website	https://www.inforights.im/

11 Frequency of policy review

The policy will be reviewed annually by MANX MINDS.